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7 Attorney for Defendant Mania Media LLC

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 BEAR OMNIMEDIA LLC,

11 Plaintiff,

12 vs.

13 MANIA MEDIA LLC dba "BEAR FILMS"
14 and BEARFILMS.com; CM
15 PUBLICATIONS LIMITED aka "The
16 magazine ALL BEAR," "ALL BEAR
17 Special Edition," "ALL BEAR EXTRA,"
18 The "ALL BEAR Newsletter", BEAR
19 WORLD MEDIA LTD,
20 BEARworldMAGAZINE.com; WEBID
21 CONSULTING LTD. Dba BEARworld.COM
22 And BEAR411.COM; and STEVEN TILOTTA
23 dba playBEARMAGAZINE.COM AND dba
24 playBEAR.COM; INSTAGRAM INC., a
25 Delaware corporation; INSTAGRAM LLC,
26 A Delaware corporation; DOES I-X, ROE
27 COMPANIES I-X

Defendant

Case No.: 2:17-cv-1478-MMD-CWH

(FIRST) MOTION FOR EXTENSION OF
TIME FOR DEFENDANT MANIA MEDIA
TO RESPOND TO THIRD AMENDED
COMPLAINT

(FIRST) MOTION FOR EXTENSION OF TIME FOR DEFENDANT MANIA MEDIA TO RESPOND TO THIRD
AMENDED COMPLAINT - 1

1 Defendant Mania Media LLC, by and through its counsel of record, Chad Anderson,
2 Attorney at Law, hereby move this Honorable Court to extend by 7 days the time for it to file its
3 response to Plaintiff's Third Amended Complaint. In support of the motion, counsel states:

4 1. On December 14, 2017, this Court entered an Order granting Mania Media's motion to
5 set aside clerk's entry of default (ECF No. 79);

6 2. Within its motion to set aside clerk's entry of default, Mania Media requested that it
7 be permitted to respond to Plaintiff's Third Amended Complaint (by way of either a Motion to
8 Dismiss Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, a Motion to Dismiss
9 under Nevada's anti-SLAPP statute, or an Answer) within 20 days of entry of an order granting
10 its motion (ECF No. 66);

11 3. As the Court granted the motion to set aside clerk's entry of default on December 14,
12 2017, Mania Media's response is currently due January 3, 2018;

13 4. While counsel has endeavored to finalize a response by the current due date, an
14 extension is necessary and warranted to allow counsel to finalize a full and appropriate response
15 that will assist the Court in addressing this matter;

16 5. Good cause exists to allow a brief extension of 7 days for Mania Media to finalize its
17 response, specifically, the intervening holidays between December 21 and January 3 reduced the
18 amount of time counsel could devote to preparing a response;

19 6. Additionally, this brief extension will not delay this matter, as Defendant Instagram
20 has until January 31, 2018, to respond to the complaint (*see* ECF No. 80), and thus there is no
21 prejudice to any party in granting Mania Media a brief extension;

22 7. Finally, counsel has made no prior request to extend the time to respond to the
23 complaint.

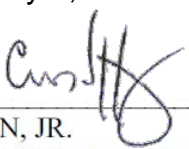
24 (FIRST) MOTION FOR EXTENSION OF TIME FOR DEFENDANT MANIA MEDIA TO RESPOND TO THIRD
25 AMENDED COMPLAINT - 2
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1 In light of the foregoing, Mania Media respectfully request a 7-day extension to file
2 its response to Plaintiff's Third Amended Complaint.
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5 Respectfully submitted this 3rd day of January, 2018

8 IT IS SO ORDERED.

9 DATED: January 4, 2018

10
11 
12 C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

6 /s/ Chad Anderson

7 Chad Anderson, Attorney at Law
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Attorney for Mania Media LLC

13 CERTIFICATE OF SERVICE

14
15 I hereby certify that a copy of the foregoing was electronically filed with the
16 Court's Electronic Filing System and served on the attorneys of record for all parties in the above
17 cause in accordance with the Federal Rules of Civil Procedure on January 3, 2018.
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19

20 /s/ Chad Anderson